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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF MOLLY JENNINGS
IN SUPPORT OF META PLATFORMS,
INC.'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL**

Judge: Hon. James Donato

1 I, Molly Jennings, declare as follows:

2 1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent Meta
3 Platforms, Inc. in the above-captioned action. I have personal knowledge of the matters stated
4 herein and, if called upon, I could and would competently testify thereto.

5 2. Pursuant to Local Rule 79-5, I submit this Declaration in support of Meta's
6 Administrative Motion to File Under Seal Meta's Motion to Exclude Testimony of Nicholas
7 Economides.

8 3. As will be discussed in a "more fulsome and revised motion to seal" after the
9 completion of briefing pursuant to Paragraph 31 of this Court's Standing Order for Civil Cases,
10 Meta's Motion to Exclude Testimony of Nicholas Economides and the accompanying exhibits
11 include information that Meta designated as "Confidential" or "Highly Confidential" under the
12 Stipulated Protective Order, Dkt. 314, which, if revealed to competitors or counterparties, could
13 cause competitive harm to Meta.

14 4. Attached to this declaration are unredacted versions of the Motion and the
15 accompanying exhibits.

16 5. Pursuant to Paragraph 31 of the Court's Standing Order for Civil Cases, Meta will
17 file a combined Motion to Seal promptly after briefing on the Motions is complete and will work
18 in good faith to minimize the amount of material sought to be sealed to ensure it is narrowly
19 tailored in light of the right of public access to the record.

20 I declare that the foregoing is true and correct under penalty of perjury.

21 Executed on this 15th day of September, 2023, in Washington, D.C.

22
23 By: /s/ Molly M. Jennings
24 Molly M. Jennings
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